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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SUSAN RAMIREZ, <i>Guardian ad Litem for</i>)	Case No. 1:21-cv-00109-EPG
<i>N.R.,</i>)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
Plaintiff,)	(ECF No. 18)
vs.)	
KILOLO KIJAKAZI, Acting)	
Commissioner of Social Security,)	
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from November 22, 2021 to January 21, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Good cause exists for this extension. Counsel has recently received a greater number of Answers and Certified Administrative Records from defendant in cases in this district, and the three other California Districts, each of which require settlement negotiations or merit briefing. Counsel has a greater

1 than usual number of merit briefs due in November and December 2021. Thus, Counsel is
2 requesting an extension through January 21, 2022 to accommodate the number of cases due.
3 For the weeks of November 15, 2021 and November 22, 2021, Counsel has 10 merit briefs,
4 several reply and settlement letters. Counsel also has 20 administrative hearings before the
5 Office of Hearings Operations. For the month of December 2021, Counsel has 20 merit briefs
6 scheduled due.

7 Counsel has also received an increase in the number of AC denials which require a
8 review for possible filing in US District Court. Lastly, Counsel has end of the year business
9 reviews to conduct as the CEO of Peña & Bromberg, PC.

10 Due to the increase in certified administrative records being filed by defendant, Counsel
11 for Plaintiff has a larger than usual number of briefs due for the months of November and
12 December 2021.

13 Compounding the issue of an increased number of merit briefs due, Counsel has
14 preplanned vacation days for the Thanksgiving and Christmas holidays. Counsel respectfully
15 requests the Court granted the requested extension.

16 Counsel for the Plaintiff does not intend to further delay this matter. Defendant does not
17 oppose the requested extension. Counsel apologizes to the Defendant and Court for any
18 inconvenience this may cause.

19
20 Respectfully submitted,

21 Dated: November 11, 2021 PENA & BROMBERG, ATTORNEYS AT LAW

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23 By: /s/ Jonathan Omar Pena
24 JONATHAN OMAR PENA
25 Attorneys for Plaintiff

26 Dated: November 12, 2021 PHILLIP A. TALBERT
27 Acting United States Attorney
28 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX

Social Security Administration

By: */s/ Chantal Jenkins
Chantal Jenkins
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on November 12, 2021)

ORDER

Based on the above stipulation (ECF No. 18), IT IS ORDERED that Plaintiff shall file Plaintiff's opening brief no later than January 21, 2022. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: November 15, 2021

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE